



Broadband Internet Solutions

Received & Inspected

MAR 08 2012

FCC Mail Room

March 6, 2012

Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

RE: Request for Waiver – USAC late filing fees  
WC Docket No. 06-122  
BelWave Communications  
Filer ID #829047

Dear Sirs,

BelWave Communications is an Internet Service Provider using wireless technologies. In 2007, to compliment the Internet services we provide, we began to re-sell VoIP services provided by a VoIP Service Provider based in Colorado. This VoIP Service Provider bills us at discounted/wholesale rates and we, in turn, bill the end user (our customers).

Late last year we learned that even though we are just re-selling another company's VoIP services, FCC rules do not exclude us from our need to obtain a Filer 499 ID. We requested and received our Filer ID number from USAC on December 2, 2011. USAC further informed us that even though our VoIP billing amount per year classified us as "De Minimis", quarterly and annual FCC 499 filings are still required. Again, we were not aware that our VoIP Service Provider was not, in effect, the only Provider "of record" with USAC for our VoIP billings and that we needed to report those revenues to USAC as well.

USAC requested that we begin submitting our FCC 499 reports. They also requested that we file previous period reports. Our VoIP Interstate revenues for 2007, 2008, 2009 and 2010 were approximately \$14k, \$34k, \$51k and \$54k, respectively. Those Form 499 filings were sent to USAC on December 16, 2011. Our February 2012 Form 499-Q (reporting VoIP Interstate revenues of approximately \$15k) was electronically submitted to USAC on January 14, 2012. We will timely file all future reports required as well.

No. of Copies rec'd \_\_\_\_\_  
List ABCDE \_\_\_\_\_

Again, our VoIP billing amounts have classified us as "De Minimis", and although our 499 reports were filed "late", we do not have any delinquent "contributor" amounts due to the fund. However, USAC has billed us "late filing" fees for the reports we submitted in December. These fees are significant to us, as we are a very small company. And they were certainly not planned or budgeted for. Our goal is to grow and become a "contributor" to the fund. Waiving the "late filing" fees will significantly help us meet our goal sooner than later.

Given the circumstances and reasons as described above, we respectfully request that you approve/allow USAC to waive the late filing fees billed.

Your consideration of our request is greatly appreciated.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bill Belton", with a stylized flourish extending from the end.

Bill Belton, VP  
BelWave Communications  
P.O. Box 121729  
Fort Worth, Texas 76121  
bill@belwave.com  
817-737-3124 x102 (office)  
817-336-7031 (fax)



Universal Service Administrative Company

Helping Keep America's Connected

Received & Inspected

MAR 08 2012

FCC Mail Room

Filer 499 ID: 829047

Invoice Number: UBDI0000534979

Statement Date: 01/20/2012

New Balance: \$ 4,100.00

Payment Due Date: 02/15/2012

Amount Enclosed:

BelWave Communications, Inc.  
Attention: Bill Belton  
PO BOX 121729,  
Fort Worth, TX, 76121

Mail Payment To:

Universal Service Administrative Company  
PO Box 105056  
Atlanta, GA 30348-5056

Address Change? See reverse side for instructions.

☐ If paying for multiple Filer 499 IDs, please check here and complete form on back.

Send top portion of statement with payment in enclosed envelope. Keep bottom portion for your records.

### STATEMENT OF ACCOUNT

Date	Description	Charges	Credits
	<b>Previous Balance</b>		<b>\$0.00</b>
01/13/2012	Late Filing Sanction	\$4,100.00	
<b>TOTAL OUTSTANDING USAC BALANCE AS OF 1/13/2012</b>		<b>\$4,100.00</b>	

Transactions occurring after 01/13/2012 are not reflected on this statement.

Under the Debt Collection Improvement Act of 1996 (Pub. L. 104-134) (DCIA), your BALANCE DUE is a demand that you pay a DEBT owed to the United States on or before the DUE DATE. If the DUE DATE is non-business day, payment must be received the business day before that date. Any portion of the DEBT unpaid after the DUE DATE is a DELINQUENT DEBT, which may result in sanctions, including interest, penalties, and administrative charges. Failure to file a Telecommunications Worksheet may result in a late filing fee DEBT added to your BALANCE DUE. **Read the reverse of this Invoice for important information about those sanctions and your legal rights and obligations.**

Statement Date	Invoice Number	Filer 499 ID	Balance Due USAC
01/20/2012	UBDI0000534979	829047	\$ 4,100.00
<b>FORM 499Q DATA</b>		<b>PAYMENT INFORMATION</b>	
This month's support mechanism charges were calculated using an FCC contribution factor of 0.179000 and the following revenue data:		All payments received (regardless of specific instructions) will be applied to your outstanding USAC balance in historical order as outlined in FCC order 07-150.	
<u>November 2011 499Q</u>		Please remit ACH payments in a CCD+ format to ABA #071000039, Account #5590045653.	
120b	\$16,000.00	All Wire Transfers should be sent to ABA #026009593, DDA (or Account) #5590045653.	
120c	\$0.00	Payments must include your Company Name, Filer 499 ID, and Invoice Number to ensure timely posting.	
If the figures do not correspond with your records, please contact USAC Customer Service at 888-641-8722			



Universal Service Administrative Company

Helping Keep Americans Connected

Filer 499 ID: 829047  
Invoice Number: UBDI0000534979  
Statement Date: 01/20/2012

## DETAILED SUMMARY OF CHARGES AND CREDITS

### SUPPORT MECHANISM CHARGES

Your monthly support mechanism charges were calculated according to the following formulas:

#### Quarterly Contribution Base

The quarterly contribution base is a portion of your quarterly revenue that USAC considers when determining your quarterly Universal Service Fund contribution. The quarterly contribution base equals your interstate plus international revenue. Your current quarterly contribution base equals:

$$\frac{\$ 16,000.00}{\text{Interstate Revenue (Line 120B)}} + \frac{\$ 0.00}{\text{International Revenue (Line 120C)}} = \frac{\$ 16,000.00}{\text{Quarterly Contribution Base}}$$

#### Adjusted Quarterly Contribution

USAC adjusts carriers' quarterly contribution bases by the amount that they are expected to contribute in that quarter. The calculation for an adjusted contribution amount is as follows, and takes into account the circularity deduction:

$$\frac{\$ 16,000.00}{\text{Quarterly Contribution Base}} * \frac{0.179000}{\text{FCC Contribution Factor}} = \frac{\text{Unadjusted Contribution}}{\text{Unadjusted Contribution}} * \left( \frac{0.153999}{\text{FCC Circularity Factor}} \right) = \frac{\text{Adjusted Contribution}}{\text{Adjusted Contribution}}$$





Universal Service Administrative Company

Helping Keep Americans Connected

Filer 499 ID: 829047  
Invoice Number: UBD100005.54979  
Statement Date: 01/20/2012

### De Minimis Eligibility

Carriers whose expected annual contribution is less than \$10,000 are considered de minimis and are exempted from paying into the Universal Service Fund. To be exempt, a carrier must meet the de minimis criteria on both the current 499A and 499Q forms.

You meet the de minimis criteria on both the 499A and the current 499Q. Therefore, you are eligible for the de minimis exemption during the current quarter.

Your eligibility was calculated using the contribution factors established by the FCC for determining de minimis status on each form:

#### 499A:

499A Contribution Base	*	0.123000	=	Estimated 499A Contribution

#### 499Q:

Adjusted Contribution	*	4	=	Estimated 499Q Contribution
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For more information on the FCC estimated annual factor, please see the Form 499A Instructions. For more information on the current FCC contribution factor, visit the FCC website at [www.fcc.gov](http://www.fcc.gov).

### Support Mechanism Charges

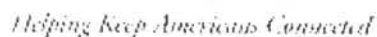
Your total monthly contribution is determined by multiplying one-third of your adjusted quarterly contribution base by the current quarter's FCC contribution factor. Your contribution is then allocated among the four support mechanisms according to the established allocation percentages for the current quarter.

1/3	*	Adjusted Quarterly Contribution	=	Total Monthly Contribution
	*	0.481214	=	\$ 0.00
Total Monthly Contribution	*	High Cost Allocation Percentage	=	High Cost Support Mechanism Charge
	*	0.264032	=	\$ 0.00
Total Monthly Contribution	*	Low Income Allocation Percentage	=	Low Income Support Mechanism Charge
	*	0.010204	=	\$ 0.00
Total Monthly Contribution	*	Rural Health Care Allocation Percentage	=	Rural Health Care Support Mechanism Charge
	*	0.244550	=	\$ 0.00
Total Monthly Contribution	*	Schools & Libraries Allocation Percentage	=	Schools & Libraries Support Mechanism Charge

### LATE FILING SANCTION

A late filing fee (described on the reverse of the invoice) may be imposed for failing to file a Worksheet (Form 499-Q or 499-A). That late filing fee is the greater of \$100 per month or an amount computed using the rate of the U.S. prime rate (in effect on the date the applicable Worksheet is due) plus 3.5 percent multiplied against the filer's monthly contribution obligation as determined by the Administrator. The fee, included in the BALANCE DUE is a DELINQUENT DEBT if not paid, and subject to COLLECTION ACTION. The reverse of the Invoice provides more information.

Filing - Due Date A	Monthly USF Obligation B	Filing Received Date C	Rate D	Days/Months Delinquent E	Additional Sanction Amount F	Accrued Sanction Amount G	Total Sanction Amount (F + G) H
Apr 11 499A - 4/1/2011	\$546.18	11/08/2011	100.00/mo	8 MONTH(S)	\$800.00	\$0.00	\$800.00
Apr 09 499A - 4/1/2009	\$282.99	12/20/2011	100.00/mo	33 MONTH(S)	\$3,300.00	\$0.00	\$3,300.00
TOTAL					\$4,100.00	\$0.00	\$4,100.00



**Filer 499 ID:** 829047  
**Invoice Number:** UBDI0000534979  
**Statement Date:** 01/20/2012

### Interest & DCLA Penalties

A DELINQUENT DEBT incurs interest at the annual rate equal to the U.S. prime rate as of the DATE OF DELINQUENCY plus 3.5 percent from that DATE until the DEBT is paid in full. Any portion of the DEBT unpaid more than 90 days, incurs a penalty of 6 percent a year from the DATE OF DELINQUENCY. The reverse of the Invoice provides more information on interest, penalties, and administrative charges. reverse of the Invoice provides more information on interest, penalties, and administrative charges.

Description - Debt Due Date	Principal	Payment/ Credit Date	Interest Rate	Days Late	Additional Interest (B*(D/365)*E)	Accrued Interest	Total Interest (F+G)	Payment & Credits Applied	Interest Outstanding	Principal Outstanding
A	B	C	D	E	F	G	H	I	J	K
<b>Outstanding Items</b>										
UBDI0000534979 - 2/15/2012	\$4,100.00		0.00%	0	\$0.00	\$0.00	\$0.00		\$0.00	\$4,100.00
					<u>\$0.00</u>			<u>\$0.00</u>	<u>\$0.00</u>	<u>\$4,100.00</u>
								<b>Principal Outstanding</b>		<b>\$4,100.00</b>
								<b>Interest &amp; Penalties</b>		<b>\$0.00</b>
								<b>Total Amount Due</b>		<b>\$4,100.00</b>



**Received & Inspected**  
**MAR 08 2012**  
**FCC Mail Room**

**Filer 499 ID:** 829047  
**Invoice Number:** UBDI0000539950  
**Statement Date:** 02/22/2012  
**New Balance:** \$ 10,700.00  
**Payment Due Date:** 03/15/2012  
**Amount Enclosed:**

BelWave Communications, Inc.  
 Attention: Bill Belton  
 PO BOX 121729,  
 Fort Worth, TX, 76121

**Mail Payment To:**

**Universal Service Administrative Company**  
**PO Box 105056**  
**Atlanta, GA 30348-5056**

Address Change? See reverse side for instructions.

☐ If paying for multiple Filer 499 IDs, please check here and complete form on back.

Send top portion of statement with payment in enclosed envelope. Keep bottom portion for your records.

**STATEMENT OF ACCOUNT**

Date	Description	Charges	Credits
	<b>Previous Balance</b>	<b>\$4,100.00</b>	
02/15/2012	Late Filing Sanction	\$6,600.00	
<b>TOTAL OUTSTANDING USAC BALANCE AS OF 2/15/2012</b>		<b>\$10,700.00</b>	

Transactions occurring after 02/15/2012 are not reflected on this statement.

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Statement Date	Invoice Number	Filer 499 ID	Balance Due USAC
02/22/2012	UBDI0000539950	829047	\$ 10,700.00
<b>FORM 499Q DATA</b>  This month's support mechanism charges were calculated using an FCC contribution factor of 0.179000 and the following revenue data:  <u>November 2011 499Q</u> <div style="display: flex; justify-content: space-between;"> <span>120b</span> <span>\$16,000.00</span> </div> <div style="display: flex; justify-content: space-between;"> <span>120c</span> <span>\$0.00</span> </div> If the figures do not correspond with your records, please contact USAC Customer Service at 888-641-8722		<b>PAYMENT INFORMATION</b>  All payments received (regardless of specific instructions) will be applied to your outstanding USAC balance in historical order as outlined in FCC order 07-150.  Please remit ACH payments in a CCD+ format to ABA #071000039, Account #5590045653.  All Wire Transfers should be sent to ABA #026009593, DDA (or Account) #5590045653.  Payments must include your Company Name, Filer 499 ID, and Invoice Number to ensure timely posting.	



Universal Service Administrative Company

Helping Keep Americans Connected

Filer 499 ID: 829047  
Invoice Number: UBDI0000539950  
Statement Date: 02/22/2012

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### SUPPORT MECHANISM CHARGES

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#### Quarterly Contribution Base

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$$\frac{\text{Unadjusted Contribution}}{\text{Unadjusted Contribution}} \times \left( \frac{\text{Unadjusted Contribution}}{\text{Unadjusted Contribution}} \times \frac{0.153999}{\text{FCC Circularity Factor}} \right) = \frac{\text{Adjusted Contribution}}$$





Universal Service Administrative Company

Helping Keep America Connected

Filer 499 ID: 829047  
 Invoice Number: UBDI0000530950  
 Statement Date: 02/22/2012

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Apr 10 499A - 4/1/2010	\$434.02	12/20/2011	100.00/mo	21 MONTH(S)	\$2,100.00	\$0.00	\$2,100.00
Apr 08 499A - 4/1/2008	\$116.51	12/20/2011	100.00/mo	45 MONTH(S)	\$4,500.00	\$0.00	\$4,500.00
TOTAL					\$6,600.00	\$0.00	\$6,600.00



Universal Service Administrative Company

*Helping Keep Americans Connected*

Filer 499 ID: 829047  
 Invoice Number: UBDI0000539950  
 Statement Date: 02/22/2012

### Interest & DCIA Penalties

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A	B	C	D	E	F	G	H	I	J	K
<b>Outstanding Items</b>										
UBDI0000534979 - 2/15/2012	\$4,100.00		6.75%	0	\$0.00	\$0.00	\$0.00		\$0.00	\$4,100.00
UBDI0000539950 - 3/15/2012	\$6,600.00		0.00%	0	\$0.00	\$0.00	\$0.00		\$0.00	\$6,600.00
					<u>\$0.00</u>			<u>\$0.00</u>	<u>\$0.00</u>	<u>\$10,700.00</u>
								<b>Principal Outstanding</b>		<b>\$10,700.00</b>
								<b>Interest &amp; Penalties</b>		<b>\$0.00</b>
								<b>Total Amount Due</b>		<b>\$10,700.00</b>